

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC. )  
and HONEYWELL INTELLECTUAL )  
PROPERTIES INC., )  
                                  )  
                                  )  
Plaintiffs, )  
                                  )  
v. )                              C.A. No. 04-1338-\*\*\*  
                                  )  
                                  )(Consolidated)  
                                  )  
APPLE COMPUTER, INC., et al., )  
                                  )  
                                  )  
Defendants. )

**PLAINTIFFS' NOTICE OF RULE 30(b)(6) DEPOSITION OF  
DEFENDANTS CITIZEN WATCH CO., LTD. AND CITIZEN DISPLAY CO., LTD.**

PLEASE TAKE NOTICE that, in accordance with Rules 26, 30(b)(6), and 32 of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of Citizen Watch Co., Ltd. and Citizen Display Co., Ltd. through one or more of their officers, directors, managing agents, or other persons who consent to testify on their behalf and who are most knowledgeable with respect to the deposition subjects set forth in Schedule B at the time and place as set forth below.

Said deposition will be taken on May 7 and 8, 2007, starting at 9:00 a.m., at Hogan & Hartson LLP, 1999 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067, or at such other time and place as may be agreed to by the parties. The deposition will continue until completed as provided in the Federal Rules of Civil Procedure. The deposition will be taken before a court reporter, notary public, or other person authorized by law to administer oaths, and will be recorded stenographically and by videotape. You are invited to attend and cross-examine.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Maria Granovsky*

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Thomas C. Grimm (#1098)  
Leslie A. Polizoti (#4299)  
Maria Granovsky (#4709)  
1201 N. Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
tgrimm@mnat.com  
lpolizoti@mnat.com  
mgranovsky@mnat.com

*Attorneys for Honeywell International Inc.  
and Honeywell Intellectual Properties Inc.*

OF COUNSEL:

Martin R. Lueck  
Matthew L. Woods  
Stacie E. Oberts  
Denise S. Rahne  
Peter N. Surdo  
Marta M. Chou  
ROBINS, KAPLAN, MILLER  
& CIRESI L.L.P.  
2800 LaSalle Plaza  
800 LaSalle Avenue  
Minneapolis, MN 55402-2015  
(612) 349-8500

Anthony A. Froio  
Marc N. Henschke  
Alan E. McKenna  
Jeremy C. McDiarmid  
ROBINS, KAPLAN, MILLER  
& CIRESI L.L.P.  
800 Boylston Street, 25<sup>th</sup> Floor  
Boston, MA 02199  
(617) 267-2300

March 27, 2007  
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**Schedule B**

1. All facts related to any claims of laches and/or estoppel raised by you in this case, including, but not limited to:
  - (a) Identification of all modules (including, but not limited to “Accused Modules”) related to your laches claim;
  - (b) Annual sales of modules identified in (a) above, in terms of number of units and revenue, including whether such sales are in the United States;
  - (c) The distribution channels for each module identified in (a) above;
  - (d) A description of whether the sales identified in response to (b) above in the United States were of uninstalled component modules, or were modules incorporated into an end product (and if so, what end product);
  - (e) For all years referenced in (b) above, identification and discussion of the advertising that identifies or describes the use of two lens arrays/prism films wherein at least one of those lens arrays/prism films is rotated;
  - (f) Statements or actions by Honeywell indicating that it would not file suit against you for infringement of the ‘371 patent;
  - (g) Any communications, conduct, or omissions that have misled you and upon which you relied regarding Honeywell’s intent to enforce the ‘371 patent.

2. All presentations and public displays, including but not limited to those at meetings of the Society for Information Display, in which you publicly discussed or disclosed the components of modules employing two lens arrays/prism films wherein at least one of the arrays/films is rotated, and identification of all documents pertaining thereto.
3. Any evidentiary or economic prejudice you have suffered as a result of any alleged delay in the filing of this suit, including but not limited to any studies of the costs, feasibility and marketability of alternative designs available at the time you began to use modules employing at least two lens arrays/prism films wherein at least one of said arrays/films is rotated.
4. The technical steps or tests useful or necessary to evaluate and determine whether an LCD module contains two lens arrays, at least one of which is rotated, as opposed to other backlighting structures.
5. All information communicated or provided to your customers regarding the internal components of your LCD modules, specifically whether such modules contain two lens arrays, at least one of which is rotated.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 27, 2007, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following: John R. Alison, Parker H. Bagley, Robert J. Benson, Robert Karl Beste, III, Elizabeth L. Brann, Christopher E. Chalsen, Hua Chen, Arthur G. Connolly, III, Frederick L. Cottrell, III, Francis DiGiovanni, Thomas M. Dunham, Kevin C. Ecker, Amy Elizabeth Evans, York M. Faulkner, Maria Granovsky, Christopher J. Gaspar, Alexander E. Gasser, Alan M. Grimaldi, Thomas C. Grimm, Thomas Lee Halkowski, Angie Hankins, Richard L. Horwitz, Dan C. Hu, John T. Johnson, Robert J. Katzenstein, Nelson M. Kee, Richard D. Kelly, Matthew W. King, Stephen S. Korniczky, Gary William Lipkin, Hamilton Loeb, Robert L. Maier, David J. Margules, David Ellis Moore, Carolyn E. Morris, Arthur I. Neustadt, Elizabeth A. Niemeyer, Andrew M. Ollis, Karen L. Pascale, Adam Wyatt Poff, Leslie A. Polizoti, John F. Presper, Alana A. Prills, Steven J. Rizzi, Lawrence Rosenthal, Avelyn M. Ross, Philip A. Rovner, Diana M. Sangelli, Robert C. Scheinfeld, Carl E. Schlier, Chad Michael Shandler, John W. Shaw, Matthew W. Siegal, Neil P. Sirota, Monte Terrell Squire, William J. Wade, Roderick B. Williams, Edward R. Yoches.

I also certify that on March 27, 2007, I caused to be served true and correct copies of the foregoing on the following as indicated below:

**BY HAND & E-MAIL:**

John W. Shaw  
Monte T. Squire  
YOUNG CONAWAY STARGATT  
& TAYLOR LLP  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19899-0391  
[jshaw@ycst.com](mailto:jshaw@ycst.com)

*Attorneys for Sony Corporation*

Karen L. Pascale  
YOUNG CONAWAY STARGATT  
& TAYLOR, LLP  
The Brandywine Building, 17th floor  
1000 West Street  
Wilmington, DE 19801  
[kpascale@ycst.com](mailto:kpascale@ycst.com)

*Attorneys for Optrex America, Inc.*

David J. Margules  
John M. Seaman  
BOUCHARD MARGULES  
& FRIEDLANDER, P.A.  
222 Delaware Ave., Suite 1400  
Wilmington DE 19801  
[dmargules@BMF-law.com](mailto:dmargules@BMF-law.com)

*Attorneys for Citizen Watch Co., Ltd.  
and Citizen Displays Co., Ltd.*

William J. Wade  
RICHARDS LAYTON & FINGER  
One Rodney Square  
P.O. Box 551  
Wilmington, DE 19899-0551  
[wade@rlf.com](mailto:wade@rlf.com)

*Attorneys for Arima Display Corporation*

Philip A. Rovner  
POTTER ANDERSON & CORROON LLP  
Hercules Plaza, 6th Floor  
1313 N. Market Street  
P.O. Box 951  
Wilmington, DE 19899  
[provner@potteranderson.com](mailto:provner@potteranderson.com)

*Attorneys for Fuji Photo Film Co., Ltd.  
and Fuji Photo Film U.S.A., Inc.*

Robert J. Katzenstein  
Robert Karl Beste, III  
SMITH, KATZENSTEIN  
& FURLOW LLP  
800 Delaware Avenue, 7th Floor  
P.O. Box 410  
Wilmington, DE 19899  
[rjk@skfdelaware.com](mailto:rjk@skfdelaware.com)

*Attorneys for Seiko Epson Corporation*

Gary W. Lipkin  
DUANE MORRIS LLP  
1100 North Market Street, 12th Floor  
Wilmington, DE 19801-1246  
[GWlipkin@duanemorris.com](mailto:GWlipkin@duanemorris.com)

*Attorneys for InnoLux Display Corporation*

Richard L. Horwitz  
David E. Moore  
POTTER ANDERSON & CORROON LLP  
Hercules Plaza, 6th Floor  
1313 N. Market Street  
P.O. Box 951  
Wilmington, DE 19899  
[rhorwitz@potteranderson.com](mailto:rhorwitz@potteranderson.com)

*Attorneys for Hitachi Displays, Ltd., Wintek Corp., Wintek Electro-Optics Corporation, Samsung SDI America, Inc. and Samsung SDI Co., Ltd.*

**BY E-MAIL:**

Robert C. Scheinfeld  
Neil P. Sirota  
BAKER BOTTs L.L.P.  
30 Rockefeller Plaza  
New York, NY 10112  
[robert.scheinfeld@bakerbotts.com](mailto:robert.scheinfeld@bakerbotts.com)  
[neil.sirota@bakerbotts.com](mailto:neil.sirota@bakerbotts.com)

*Attorneys for Hitachi Displays, Ltd.*

Andrew M. Ollis  
OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.  
1940 Duke Street  
Alexandria, VA 22314  
[aollis@oblon.com](mailto:aollis@oblon.com)

*Attorneys for Optrex America, Inc.*

Elizabeth A. Niemeyer  
FINNEGAN, HENDERSON,  
FARABOW, GARRETT  
& DUNNER, L.L.P.  
901 New York Avenue, N.W.  
Washington, DC 20001  
[elizabeth.niemeyer@finnegan.com](mailto:elizabeth.niemeyer@finnegan.com)

York M. Faulkner  
FINNEGAN, HENDERSON,  
FARABOW, GARRETT  
& DUNNER, L.L.P.  
11955 Freedom Drive  
Reston, VA 20190  
[york.faulkner@finnegan.com](mailto:york.faulkner@finnegan.com)

*Attorneys for Wintek Corp. and Wintek  
Electro-Optics Corporation*

Stephen S. Korniczky  
Elizabeth L. Brann  
PAUL, HASTINGS, JANOFSKY  
& WALKER LLP  
3579 Valley Centre Drive  
San Diego, CA 92130  
[stephenkorniczky@paulhastings.com](mailto:stephenkorniczky@paulhastings.com)  
[elizabethbrann@paulhastings.com](mailto:elizabethbrann@paulhastings.com)

Hamilton Loeb  
PAUL, HASTINGS, JANOFSKY  
& WALKER LLP  
875 15th Street, N.W.  
Washington, DC 20005  
[hamiltonloeb@paulhastings.com](mailto:hamiltonloeb@paulhastings.com)

*Attorneys for Samsung SDI Co., Ltd.  
and Samsung SDI America, Inc.*

John Flock  
KENYON & KENYON  
One Broadway  
New York, NY 10004-1050  
[jflock@kenyon.com](mailto:jflock@kenyon.com)

*Attorneys for Sony Corporation*

Stuart Lubitz  
HOGAN & HARTSON LLP  
1999 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
[slubitz@hhlaw.com](mailto:slubitz@hhlaw.com)

*Attorneys for Seiko Epson Corporation, Citizen  
Watch Co., Ltd. and Citizen Displays Co., Ltd.*

Lawrence Rosenthal  
Matthew W. Siegal  
STROOCK & STROOCK & LAVAN LLP  
180 Maiden Lane  
New York, NY 10038-4982  
[lrosenthal@stroock.com](mailto:lrosenthal@stroock.com)  
[msiegal@stroock.com](mailto:msiegal@stroock.com)

*Attorneys for Fuji Photo Film Co., Ltd.  
and Fuji Photo Film U.S.A., Inc.*

Dan C. Hu  
TROP PRUNER & HU, P.C.  
1616 South Voss Road  
Suite 750  
Houston, TX 77057-2631  
[hu@tphm.com](mailto:hu@tphm.com)

*Attorneys for Arima Display Corporation*

Donald R. McPhail  
DUANE MORRIS LLP  
1667 K Street, N.W., Suite 700  
Washington, DC 20006  
[drmcphail@duanemorris.com](mailto:drmcphail@duanemorris.com)

*Attorneys for InnoLux Display Corporation*

**BY FEDERAL EXPRESS**

Mr. Seong Yoon Jeong  
Assistant Manager  
Technology Planning Group  
BOE HYDIS TECHNOLOGY CO., LTD.  
San 136-1, Ami-ri, Bubal-eub  
Ichon-si, Gyeonggi-do 467-701  
Republic of Korea

*/s/ Maria Granovsky*

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Maria Granovsky (#4709)

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